

## REMARKS

### **I. Formalities**

Claims 27-31 remain in the subject patent application. Claims 27 and 28 are amended herein. Claims 1-26 are canceled and claims 32-46 are added herein. Support for the amendments to claim 27 can be found at least in FIGs. 1-4. Claim 28 was amended simply to correct a minor typographical error therein. Support for new claims 32, 40, and 46 can be found at least at page 4, lines 10-11, page 6, lines 13-14, page 8, lines 10-11, and page 10, lines 10-11. Support for new claims 33, 38, 42, and 45 can be found at least in FIGs. 3 and 4. Support for new claims 34 and 41 can be found at least in FIGs. 1-3. Support for new claims 35-37, 39, 43, and 44 can be found at least in originally-filed claims 28-31. Accordingly, Applicants respectfully submit that no new matter is added herein.

### **II. Response to the 35 U.S.C. §102 Rejections**

Claims 27, 30, and 31 were rejected under 35 U.S.C. §102(b) as being allegedly anticipated by U.S. Patent No. 6,175,157 to Morifuji (hereinafter “Morifuji”). These rejections are respectfully traversed in view of the remarks made below.

Anticipation requires each element of a claimed invention to be disclosed in a single reference. Disclosure cannot be predicated on teachings in a reference that are vague or based upon conjecture. It is respectfully submitted that silence in a reference is not a proper substitute for an adequate disclosure of facts from which a conclusion of anticipation may justifiably follow. A proper anticipation rejection under 35 U.S.C. §102 requires that each element of a claimed invention be disclosed in a single reference having the same elements, united in the same way, and performing the same function.

#### **A. Remarks Directed to Claim 27**

Claim 27 has been amended herein by requiring that the integrated passive component include a passive device in an interior layer of the integrated passive component. Morifuji does not show or disclose this limitation. Instead, Morifuji discloses (see FIGs. 1-7 and column 2,

lines 50-52 and lines 62-63) a sub-chip (element 16) having circuit elements only at a main surface thereof.

Based on the foregoing, Applicants respectfully submit that the 35 U.S.C. §102 rejection of amended claim 1 should be withdrawn. Such withdrawal of the rejection is respectfully requested.

**B. Remarks Directed to Claims 30 and 31**

Dependent claims must be construed to include all of the limitations of the claims from which they depend, as required by 37 C.F.R. 1.75(c) and M.P.E.P. 608.01(n). Therefore, claims 30 and 31, which depend from amended claim 1, are also not shown or disclosed by Morifuji for at least the same reasons as listed earlier for amended claim 1. Accordingly, Applicants respectfully request that the 35 U.S.C. §102 rejections of claims 30 and 31 be withdrawn.

**III. Response to the 35 U.S.C. §103 Rejections**

Claims 28 and 29 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Morifuji in view of U.S. Patent No. 6,507,120 to Lo et al. (hereinafter “Lo”). These rejections are respectfully traversed in view of the remarks made below.

**A. Remarks Directed to Claims 28 and 29**

Claims 28 and 29 depend from amended claim 27, and thus must be construed to include all of the limitations of claim 27. It was mentioned above that claim 27 has been amended herein to require that the integrated passive component include a passive device in an interior layer of the integrated passive component. It was further mentioned above that Morifuji does not show or disclose this limitation, but instead discloses a sub-chip having circuit elements only at a main surface thereof.

It is now respectfully submitted that Morifuji likewise fails to teach or suggest the stated limitation of amended claim 27. There is nothing in Morifuji, either in the figures or in the text, that would lead a person of ordinary skill in the art, or any other person, to modify the placement

of the circuit elements such that they are located not at a main surface of a sub-chip but in an interior of the sub-chip.

Lo does not deal with integrated passive components or with passive devices forming a part thereof, either at a surface or in an interior thereof, and thus wholly fails to teach or suggest the stated limitation of amended claim 27. Accordingly, Lo fails to make up for the deficiencies of Morifuji in terms of the disclosure of the stated limitation of amended claim 27. Claims 28 and 29, therefore, are not taught or suggested by Morifuji, by Lo, or by the combination of Morifuji and Lo.

Based on the foregoing, Applicants respectfully submit that the rejection of claims 28 and 29 should be withdrawn. Such withdrawal of the rejections is respectfully requested.

#### **IV. Remarks Directed to the New Claims**

It is respectfully submitted that none of the new claims are shown, disclosed, taught, or suggested by any of the cited references. Specifically, the cited references do not show, disclose, teach, or suggest: (1) a method of manufacturing a semiconductor component including the steps of attaching a semiconductor chip having a first surface area to a leadframe, and attaching an integrated passive component having a second surface area to the semiconductor chip, where the second surface area is at least as large as the first surface area; or (2) a method of manufacturing a semiconductor component including the steps of providing a semiconductor chip having an active side and an inactive side, attaching the semiconductor chip to the leadframe such that the active side faces the leadframe; and attaching an integrated passive component to the semiconductor chip such that the semiconductor chip is located between the integrated passive component and the leadframe and the inactive side of the semiconductor chip faces the integrated passive component.

Regarding item (1), Morifuji teaches away from the stated limitation as shown at least in FIGs. 1-7 and at column 2, lines 50-60. Regarding item (2), Morifuji teaches away from the stated limitation as shown at least at column 1, lines 45-60. Based on the foregoing it is respectfully submitted that the new claims are in condition for allowance.

### CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. In light of the amendments and remarks set forth above, Applicants respectfully request reconsideration and allowance of all of the pending claims.

No fees are believed to be due in connection with this paper. However, the Commissioner for Patents is hereby authorized to charge any fees necessitated by this Response, or credit any overpayment, to Account No. 02-4467.

If there are matters that can be discussed by telephone to further the prosecution of this application, Applicants invite Examiner Vu to call the undersigned attorney at the Examiner's convenience.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kenneth A. Nelson". The signature is fluid and cursive, with the first name "Kenneth" being more prominent.

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